REMARKS

Applicants respectfully traverse and request reconsideration.

Applicants wish to thank the Examiner for the thorough search of the subject matter and for finding allowable subject matter in Claims 4, 6, 9, 11, and 15.

Claims 1, 3, 7-8, and 13-14, stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mathews, III et al. (U.S. Patent No. 5,724,492). In response to Applicants' arguments, filed January 26, 2004, the Examiner states that, "The Examiner cannot find the difference between Matthews III et al's 'texture mapping' as asserted by the Applicants and the feature as now claimed 'mapping the source image as a texture." Applicants respectfully submit, however, that, for at least the reasons discussed below, the feature, 'mapping the source image as a texture into the rotated destination area,' as taught in Applicants' claimed invention, is substantially different from the operation of 'texture mapping' disclosed in Matthews III et al. since Matthews III et el. refer simply to using the known technique of creating an object to look like a 3D representation of the object using texture maps to apply a texture to the object to make it look like a 3D representation. There is no teaching of a source image nor of a source image being mapped as a texture into a rotated destination area or of calculating the vertices of a rotated destination area to perform such mapping.

Where the phrase texture mapping appears, Matthews III et al. is silent on using texture mapping to rotate an image. Matthews III et al. use texture mapping in two very instances as shown here:

> "To achieve the desired transitional effect and to convince the viewer that the object is a three-dimensional representation, techniques such as texture mapping and real-time three-dimensional graphics and animation may be employed." (col. 15, lines 47-51)
> "To achieve the desired transitional effect and to convince the viewer that the object is a three-dimensional representation, the hand held computer employs

techniques such as texture mapping and real-time three-dimensional graphics and animation." (col. 18, lines 41-45)

Neither citing, nor its surrounding context, describes using texture mapping to actually rotate an image that is stored in memory. If the rejection is maintained, Applicants respectfully request a showing from the Examiner as to where such teachings are provided in Matthews III et al.

In the absence of a definition of texture mapping in Matthews III et al, Applicants defined the phrase based on what is well-known in the art in arguments filed, January 26, 2004. In particular, Applicants stated, "In this regard, Matthew, III appears to teach a *conventional* approach to texture mapping in which a two-dimensional surface is applied to a 3D object such as the face of a 3-D object (i.e., a panel). *See* Computer Desktop Encyclopedia, Alan Freedman, pg. 970-971 (9th edition, 2001) (defining the common method of texture mapping to be the process of creating "a 2-D bitmapped image of the texture, called a 'texture map,' which is then 'wrapped around' the 3-D object"). In essence, the conventional use of texture maps is limited to draping a 2-D texture image over a 3-D object. Matthews, III employs this conventional approach to provide a more realistic three dimensional image to the user. The three-dimensional image then rotates about its major axis utilizing real-time three-dimensional graphics and animation. (Col 15, Lines 47-67)."

By way of comparison, Applicants disclose, in one example, and not by way of limitation, storing a source image in memory as a bit map image (page 7, line 8-9 and 30-31). After a command, a driver (e.g., a processor executing the driver code) tessellates the source image to determine vertice primitives while defining the source image as a texture (page 7, line 21 – page 8, line 3). Each determined vertice primitive, such as a triangle or rectangle, thereby includes a set of vertices with each vertex having coordinate, color, and texture information (page 5, lines 9-17). The driver then calculates the vertices of a rotated destination area, based

on the angle of rotation, such that each vertex in the source image is associated to a corresponding vertex in the rotated destination area (target) (page 6, lines 17-28). The driver then sends the resulting primitive vertices (including the texture information for each vertex) to the 3D engine (page 8, lines 7-10). The 3D engine then maps the texture information to the rotated destination area (page 8, lines 10-12).

In summary, Applicants teach a method to actually rotate a source image by mapping the source image as a texture into a rotated destination area. Meanwhile, Matthews III et al. merely teach draping a 2-D texture image over a 3-D object to obtain a visual 3D effect. Applicants' feature, 'mapping the source image as a texture into the rotated destination area,' is, therefore, not taught or suggested from the, 'texture mapping' operation disclosed in Matthews III et al. Applicants therefore clearly claim novel and non-obvious subject matter not disclosed in Matthews III et al.

In addition to the above, the Examiner cites column 16, lines 57-60, to allege that Matthews III et al. disclose "receiving a command to rotate a source image located in off-screen memory." This citing states that "the channel manager object is not displayed on the monitor" during idle state. However, this citing does not establish that a source image *located in off-screen memory* is rotated or that the source image is ever located in off-screen memory. Applicants respectfully request a showing from the Examiner that Matthews III et al. teaches locating a source image, targeted for rotation, in off-screen memory.

In regards to Claims 1 and 7, Applicants reference the relevant remarks above. Accordingly these claims are believed to be in condition for allowance. In addition, the dependent claims add additional novel and non-obvious subject matter and are also believed to be in condition for allowance.

In regards to Claim 13, Applicants reference the relevant remarks above. Further, in response to Applicants' arguments, filed January 26, 2004, Examiner cites column 15, lines 20-25, to allege that Matthews III et al. discloses user selection of the orientation of the rotated image. However, the citing in Matthews III et al. appears to teach a menu key that, when pressed, causes a channel manager object to change sizes, rotate, and move according to a predetermined routine to an ending location. Matthews et al. does not appear to provide an interface for a user to select a particular screen rotation angle for a source image. Accordingly, Matthews III et al. does not teach the feature, 'user selection of the orientation of the rotated image.' Claim 13 is therefore believed to be in condition for allowance. In addition, the dependent claims add additional novel and non-obvious subject matter and are also believed to be in condition for allowance.

Claims 2, 5, 10, 12, and 16, stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Matthews, and in view of Deering (U.S. Patent No. 6,466,206). In regards to Claims 2, 5, 10, 12, and 16, Applicants reference the relevant remarks under Claims 1, 7, and 13 above. The dependent claims add additional novel and non-obvious subject matter and are also believed to be in condition for allowance.

As to new claims 17 and 18, these claims are also believed to be allowable for the relevant reasons stated above with respect to at least claim 1.

Accordingly, Applicants respectfully submit that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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